

The Boeing Company
Santa Susana Field Laboratory
5800 Woolsey Canyon Road
Canoga Park, CA 91304-1148

Via FedEx

September 11, 2009

In reply, please refer to SHEA-109081



Mr. Gary Butner
Chief, Radiologic Health Branch
California Department of Public Health
1500 Capitol Ave.
MS 7610
Sacramento, CA 95814-5006

Subject: Disposal of ISRA Outfall 009 Soil to a Class 1 Hazardous Waste Landfill

Dear Mr. Butner:

The Boeing Company, on behalf of NASA, is currently preparing to excavate soil at Outfall 009 as part of the Interim Source Removal Action (ISRA) program. This program is overseen by the Regional Water Quality Control Board (RWQCB). This soil is being removed in order to mitigate NPDES storm water runoff exceedances of dioxins and heavy metals.

In order to characterize the soil for off-site disposal, chemical and radiological sampling has been performed. Radiological sampling and analysis was consistent with prior CDPH-approved protocols for the Northern Drainage cleanup. Of the thirty six samples taken, eight samples slightly exceeded the maximum of our local cesium-137 background. During subsequent re-sampling of those eight locations, only five were confirmed to exceed the maximum background.

All other radionuclides analyzed are either non-detect or consistent with background concentrations. These include strontium-90, tritium, americium-241, cesium-134, cobalt-60, europium-152, europium-154, manganese-54, potassium-40, sodium-22, thorium-228, thorium-232, uranium-235 and uranium-238.

The Boeing Company and NASA intend to dispose of this soil to a Class 1 hazardous waste landfill. To facilitate this disposal, Boeing has prepared the enclosed waste certification package that includes,

- radiological results for gamma emitting radionuclides, strontium-90 and tritium

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- statistical comparisons of cesium-137 and strontium-90 to background
- conservative dose estimates

The waste certification also provides the regulatory basis for the disposition of this soil to either a Class 1 or 2 landfill, by demonstrating compliance with landfill permits and with California Health & Safety Code Section 114715.



The Boeing Company and NASA respectfully requests that the CDPH review the data, and confirm in writing, that the soil meets the permit requirements of Class 1 and 2 landfills in the State of California, and that the disposal of the soil would not pose a threat to public health. Subsequently, Boeing would provide the final waste certification plus the CDPH confirmation letter to the disposal site prior to shipping the soil.

Boeing and NASA are voluntarily making this request at the suggestion of James Thomas of your office, Jim Pappas of the DTSC and Cassandra Owens of the RWQCB. This is a one time request for this specific material and will not set a precedent. Indeed, Boeing is cognizant of CDPH's position that shipment of material to Class 1 or 2 landfills does not normally require CDPH approval.

Neither Boeing nor NASA will initiate excavation of this material until CDPH, DTSC and the RWQCB approve this path forward.

If you have any questions on the enclosed material, please contact Phil Rutherford at 818-466-8840.

Sincerely,


Phil Rutherford
Manager, Health, Safety & Radiation Services
Environment, Health & Safety

Enclosure: "Outfall 009 Interim Source Removal Action (ISRA) - Soil Sampling for Radionuclides - Results and Statistical Analysis - Waste Certification." Rev. 4, September 11, 2009

cc with enclosure

Cassandra Owens	RWQCB
Jim Pappas	DTSC
✓ James Thomas	CDPH
Allen Elliott	NASA
Steven Slaten	NASA